RioTinto

October 10, 2018

Sent via Electronic Mail

Director, Emergency and Remedial Response Division Attn: Chief, New Jersey Remediation Branch, Pohatcong Site United States Environmental Protection Agency Region 2 290 Broadway, 19th Floor New York, New York 10007

New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency Region 2
290 Broadway, 17th Floor
New York, New York 10007
Attention: Attorney for Pohatcong Site

New Jersey Department of Environmental Protection ATTN.: Fred Mumford 380 Scotch Road West Trenton, New Jersey 08628 (via electronic mail only)

Re: Monthly Progress Report No. 43
Reporting Period September 1, 2018 to September 30, 2018
2014 Vapor Intrusion Removal Action at the Washington Facility
Pohatcong Valley Groundwater Contamination Superfund Site
Warren County, New Jersey

Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, Ramboll US Corporation (Ramboll) submits this monthly progress report in compliance with Section X, Paragraph 30 of the CD and Appendix B-3 to the CD, Statement of Work for the 2014 Vapor Intrusion Removal Action at the Washington Facility (2014 VI Removal Action SOW) at the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. This report provides a description of the actions and

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 14-cv-05798) effective March 11, 2015.

activities undertaken pursuant to the CD and related to the 2014 VI Removal Action SOW during this reporting period and plans, actions and data scheduled in the next 8 weeks.

Actions Taken toward Compliance with Consent Decree, including Community Relations

The following activities were performed during this reporting period:

- The long-term soil vapor extraction (SVE) system and east wall sub-slab depressurization system (SSDS) continued operation during this reporting period. The SVE system is currently operating at an overall vacuum of 7 inches Hg with an average inlet flow rate of approximately 440 cubic feet per minute (CFM).
- During this period the 500 CFM SVE system operated 100% of the time (i.e., a total of 720 hours over 30 days) and the east wall SSDS operated 100% of the time.
- The Monthly Progress Report No. 42 for the VI Removal Action at the Washington facility reporting August 2018 activities was submitted to the USEPA in a letter dated September 10, 2018.
- Updated exhibits addressing comments received by USEPA on the Supplemental Deed Notice were submitted in email correspondence dated September 18, 2018.
- Ramboll collected sub-slab vapor monitoring port vacuum and photoionization detector (PID) measurements on September 27, 2018. These measurements and the SVE blower runtime for the September 2018 reporting period are included in the summary table in Attachment 1. The locations of the SSDS wells and vapor monitoring points are provided in Attachment 2.

Routine OM&M Events:

The following routine OM&M events were conducted during this reporting period:

None during this period.

Problems Encountered, Actions Taken and Their Resolutions

The following problems were encountered during this reporting period:

None during this period.

Analytical Results and Data Received During the Reporting Period

The following analytical data were received during this reporting period:

None during this period.

Anticipated Plans, Actions and Data Scheduled (during the Next 8 weeks)

The following activities are planned for the next eight weeks:

• One round of measurements of the SVE system and SSDS is planned to be performed in October 2018.

Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

· None during this period.

Closing

If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

Luis Hidalgo Project Coordinator

Attachments:

- (1) SVE/SSDS Measurements, September 27, 2018
- (2) Locations of SVE Wells, SSDS Extraction Wells, and Vapor Monitoring Points

cc: Via Electronic Mail
Michelle Granger – USEPA, Region 2
Dave Cline – Rio Tinto
Roy Duckett – Rio Tinto
Jeff Armington – Rio Tinto
Bruce White – Barnes & Thornburg LLP
Bruce Kennington – Ramboll

ATTACHMENT 1

SVE/SSDS Measurements September 27, 2018

SVE/SSDS Measurements, September 27, 2018 Vapor Intrusion Response Activities Albéa Americas, Washington Facility 191 Route 31 North, Washington, Warren County, New Jersey

Sub Slab Measurement	PID	Vacuum
Location	(ppm)	(inches of water)
CDM-SS-01	0.198	-0.930
CDM-SS-02N	0.156	-2.044
CDM-SS-02S	0.185	-2.039
CDM-SS-03	1.007	-0.257
CDM-SS-04	1.252	-0.016
CDM-SS-05	2.345	-0.005
CDM-SS-06	0.476	-0.308
CDM-SS-07	1.167	-0.100
CDM-SS-08	5.611	-2.257
1 CDM-SS-09		
CDM-SS-10	0.245	-0.008
EPA-SS-11	1.211	-0.007
EPA-SS-12	2.956	-0.761
EPA-SS-13	0.112	-0.001
EPA-SS-14	0.037	-0.003
EPA-SS-15	0.130	-0.002
EPA-SS-16	1.600	-0.090
EPA-SS-17	1.385	-0.082
EPA-SS-18	2.237	-0.073
EPA-SS-19	0.829	-0.055
EPA-SS-20	2.188	-0.013
EPA-SS-21	3.279	-1.095
EPA-SS-22	6.234	-1.104
¹ EPA-SS-23		
EPA-SS-24	0.193	-0.358
EPA-SS-25	0.120	-0.001
¹ EPA-SS-26		
EPA-SS-27	2.300	-0.146
EPA-SS-28	0.976	-0.026
EPA-SS-29	1.545	-0.146
EPA-SS-30	0.107	-1.020
EPA-SS-31	0.113	-0.535
EPA-SS-32	0.089	-0.460
VP-2	6.022	-2.133
VP-3	1.408	-0.129
VP-7	1.167	-0.100
VP-10	5.416	-0.101
VP-11	5.049	-0.002
VP-12	1.714	-0.067
VP-13	1.318	-0.001
VP-14	1.703	-0.173
VP-15	2.242	-0.373
VP-16	2.519	-0.450

SVE/SSDS Measurement	PID	Vacuum
Location	(ppm)	(inches of water)
SSDS-01	2.261	-27
SSDS-02	1.822	-37
SSDS-03	6.555	-12
SSDS-04	1.958	-38
SSDS-05	1.505	-4
² SSDS-06		
² SSDS-07		
² SSDS-08		
² SSDS-09		
² SSDS-10		
SVE-1	0.498	-71
SVE-2	0.506	-70
SVE-3	0.945	-80
SVE-4	1.436	-70
SVE-5	0.205	-76
SVE-6	0.593	-79
SVE-7	5.170	-77
¹ SVE-8		
SVE-9	0.536	-71
SVE-10	1.131	-75
SVE-11	1.567	-70
SVE-12	1.235	-72
SVE-13P	2.888	-50
SVE-14P	6.933	-69
SVE-15P	4.852	-25
SVE-16P	5.268	-28

Vapor Phase GAC Measurements		
Location	PID (ppm)	
VGAC1 IN	3.153	
VGAC1 OUT	0.055	
VGAC2 OUT	0.066	

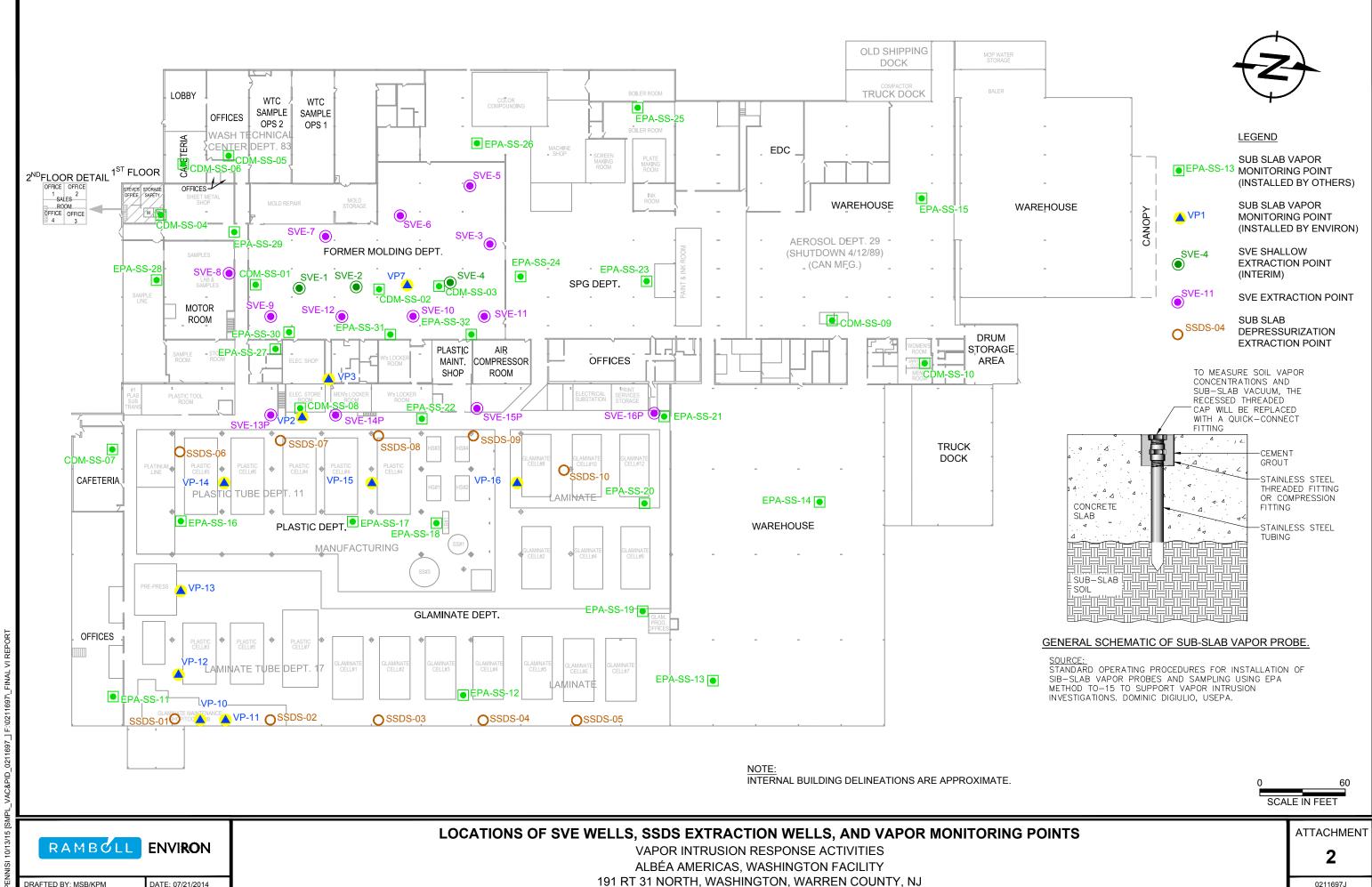
Summary of SVE Blower Runtime for Reporting Period		
Hour Meter at end of Previous Reporting Period (Hours)	35,453	
Hour Meter at end of Current Period (9/30/2018) (Hours)	36,173	
Total SVE Blower Runtime for Reporting Period (Hours)	720	

Notes:

- Vapor monitoring point not accessible; no measurement collected.
 Locations SSDS-06 through SSDS-10 (West Wall) are for standby use only and were not operational at the time of measurement.

ATTACHMENT 2

Locations of SVE Wells, SSDS Extraction Wells, and Vapor Monitoring Points



191 RT 31 NORTH, WASHINGTON, WARREN COUNTY, NJ

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